

# EXHIBIT 24

## THE HONORABLE THOMAS S. ZILLY

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

HUNTERS CAPITAL, LLC, et al.,

Case No. 20-cv-00983

Plaintiffs,

PLAINTIFF HUNTERS CAPITAL, LLC'S  
ANSWERS AND RESPONSES TO  
DEFENDANT CITY OF SEATTLE'S  
FIRST DISCOVERY REQUESTS

CITY OF SEATTLE,

Defendant.

Pursuant to Rules 26, 33, and 34 of the Federal Rules of Civil Procedure, Plaintiff Hunters Capital, LLC (“Hunters Capital” or “Plaintiff”) hereby responds and objects to Defendant City of Seattle’s (“Defendant” or the “City”) First Discovery Requests containing Defendant’s first sets of Interrogatories and Requests for Production. No admissions of any nature whatsoever are implied or should be inferred from the answers, responses, and objections set forth below. Plaintiff has answered these requests based on its current knowledge and understanding with respect to the matters addressed. Discovery in this action is on-going. Plaintiff reserves its right to alter, supplement, modify, or otherwise amend its responses as necessary or appropriate.

PLAINTIFF HUNTERS CAPITAL, LLC'S  
ANSWERS AND RESPONSES TO DEFENDANT  
CITY OF SEATTLE'S FIRST DISCOVERY  
REQUESTS

REQUESTS  
Case No. 20-cv-00983 - 1

LAW OFFICES  
**CALFO EAKES LLP**  
1301 SECOND AVENUE, SUITE 2800  
SEATTLE, WASHINGTON 98101  
TEL. (206) 407-2200 FAX. (206) 407-2224

1 **RESPONSE:**

2 Plaintiff objects to this request as vague, ambiguous, overly broad, unduly burdensome,  
3 and duplicative. Without waiving any objection, and subject to continuing investigation, Plaintiff  
4 will conduct a reasonable search for documents relevant to the claims and defenses in this case  
5 and will produce responsive, non-privileged documents, if any, within a reasonable time, on a  
6 rolling basis.

7 **REQUEST FOR PRODUCTION NO. 12:**

8 Please produce all documents supporting your allegation that the City adopted a policy  
9 supporting the CHOP occupation.

10 **RESPONSE:**

11 Plaintiff objects to this request as vague, ambiguous, overly broad, unduly burdensome,  
12 and duplicative. The term “policy” is undefined. Plaintiff further objects to this request to the  
13 extent it seeks documents already in the possession of, or otherwise available to, the City or  
14 documents that are publicly available or equally available to the City, including as matter of public  
15 record. Discovery in this matter is ongoing and Plaintiff anticipates that most documents  
16 responsive to this request are in possession of the City, in addition to documents publicly available.

17 Without waiving any objection, and subject to continuing investigation, Plaintiff will  
18 conduct a reasonable search for documents relevant to the claims and defenses in this case and will  
19 produce responsive, non-privileged documents, if any, within a reasonable time, on a rolling basis.

20 **REQUEST FOR PRODUCTION NO. 13:**

21 Please produce all documents relating to any damages you contend were suffered by any  
22 member of the proposed class a result of the CHOP activities alleged in the complaint.

23 **RESPONSE:**

24 Plaintiff objects to this request as vague, ambiguous, overly broad, unduly burdensome,  
25 and duplicative. Plaintiff further objects to this request in so far as calls for production of

1 documents not in Plaintiff's possession or documents that are otherwise publicly available and  
2 equally available to the City. Without waiving any objection, and subject to continuing  
3 investigation, Plaintiff will conduct a reasonable search for documents relevant to the claims and  
4 defenses in this case and will produce responsive, non-privileged documents, if any, within a  
5 reasonable time, on a rolling basis.

6 **REQUEST FOR PRODUCTION NO. 14:**

7 Please produce all documents reflecting any time you claim that a customer or other  
8 business contact was unable to access your property as a result of the CHOP activities alleged in  
9 the complaint.

10 **RESPONSE:**

11 Plaintiff objects to this request as vague, ambiguous, overly broad, unduly burdensome,  
12 and duplicative. The terms "customer" and "other business contact" are not defined. Without  
13 waiving any objection, and subject to continuing investigation, Plaintiff will conduct a reasonable  
14 search for documents relevant to the claims and defenses in this case and will produce responsive,  
15 non-privileged documents, if any, within a reasonable time, on a rolling basis.

16 **REQUEST FOR PRODUCTION NO. 15:**

17 To the extent you claim to have suffered emotional distress as a result of the CHOP  
18 activities alleged in the complaint, please produce all documents relating to your suffering,  
19 including without limitation any medical or counseling documents (e.g., treatment records,  
20 diagnoses) dating from May 1, 2019, to present day.

21 **RESPONSE:**

22 Plaintiff objects to this request as vague, ambiguous, overly broad, and unduly  
23 burdensome. Plaintiff is a business entity and, as such, does not claim emotional distress for itself.  
24 However, other plaintiffs in this action do claim emotional distress and can respond for themselves.  
25

1 track your business transactions on a daily basis from May 1, 2019, to present day.

2 **RESPONSE:**

3 Plaintiff objects to this request as vague, ambiguous, overly broad, unduly burdensome,  
4 and duplicative. The terms “general ledger” and “accounting records” are undefined and overly  
5 broad and, as such, seeks documents that are not relevant to the claims and defenses at issue and  
6 proportional to the needs of the case.

7 Without waiving any objection, Plaintiff is willing to confer with the City regarding a  
8 limited request for financial records relevant to the claims and defenses at issue and in proportion  
9 to the needs of the case.

10 **REQUEST FOR PRODUCTION NO. 26:**

11 Please produce all documents concerning tenant complaints, including without limitation  
12 requests for rent abatements or credits, from February 1, 2020, to present day.

13 **RESPONSE:**

14 Plaintiff objects to this request as vague, ambiguous, overly broad, unduly burdensome,  
15 and duplicative. As written, this request seeks irrelevant information and potentially relates to any  
16 complaints outside of the geographic area or timeframe at issue in this case and are therefore  
17 unrelated to the claims and defenses at issue as well as an immense burden and far out of proportion  
18 to the needs of the case.

19 Without waiving any objection, and subject to continuing investigation, Plaintiff will  
20 conduct a reasonable search for documents relevant to the claims and defenses in this case,  
21 including any tenant complaints related to the CHOP or that occurred in buildings affected by the  
22 CHOP occupation for the time period requested, and will produce any responsive, non-privileged  
23 documents, if any, within a reasonable time, on a rolling basis.

24 **REQUEST FOR PRODUCTION NO. 27:**

25 Please produce all documents reflecting any efforts you took between February 2020 and

1 and duplicative. As written, this request seeks irrelevant information and potentially relates to all  
2 of Plaintiff's business outside of the geographic area or timeframe at issue in this case. This request  
3 is therefore unrelated to the claims and defenses at issue as well as an immense burden and far out  
4 of proportion to the needs of the case.

5 Without waiving any objection, and subject to continuing investigation, Plaintiff will  
6 conduct a reasonable search for documents relevant to the claims and defenses in this case,  
7 including tenant occupancy information for buildings in or near the CHOP or for buildings affected  
8 by the CHOP for the time period requested, and will produce any responsive, non-privileged  
9 documents, if any, within a reasonable time, on a rolling basis.

10  
11 DATED this 15th day of January, 2021.

12 By /s Patty A. Eakes

13 Patricia A. Eakes, WSBA #18888  
14 Angelo J. Calfo, WSBA #27079  
15 Tyler S. Weaver, WSBA #29413  
16 Andrew DeCarlow, WSBA #54471  
17 Henry Phillips, WSBA #55152  
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23  
24  
25 *Attorneys for Plaintiffs*

1 RESPONSES dated this 12<sup>th</sup> day of January, 2021.

2 HUNTERS CAPITAL, LLC

3 BV  
Its: Mary

6 **VERIFICATION**

7 STATE OF WASHINGTON )  
8 COUNTY OF KING ) ss.  
9 )

10 \_\_\_\_\_, being duly sworn, on oath says:

11 That he/she is the \_\_\_\_\_ of HUNTERS CAPITAL, LLC; that he/she has read  
12 the answers and responses to CITY OF SEATTLE'S FIRST DISCOVERY REQUESTS TO  
13 PLAINTIFF HUNTERS CAPITAL, LLC, knows the contents thereof and believes the same to be  
true and correct.

14 \_\_\_\_\_  
15  
16 SUBSCRIBED AND SWORN TO before me this \_\_\_\_\_ day of \_\_\_\_\_,  
17 2021.

18 \_\_\_\_\_  
19 [PRINT NAME] \_\_\_\_\_  
NOTARY PUBLIC in and for the State of Washington,  
20 residing at \_\_\_\_\_  
My appointment expires: \_\_\_\_\_

21  
22  
23  
24  
25  
PLAINTIFF HUNTERS CAPITAL, LLC'S  
ANSWERS AND RESPONSES TO DEFENDANT  
CITY OF SEATTLE'S FIRST DISCOVERY  
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Case No. 20-cv-00983 - 26

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